



Plaintiff may file an opposition to the motion to dismiss or transfer by September 27, 2021, limited to 30 pages. Defendant shall file its reply on the motion to dismiss by October 4, 2021.

SO ORDERED.

Date: September 23, 2021

New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan".

JOHN P. CRONAN

United States District Judge

September 22, 2021

VIA ECF AND E-MAIL ([CronanNYSDCambers@nysd.uscourts.gov](mailto:CronanNYSDCambers@nysd.uscourts.gov))

The Honorable John P. Cronan  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Room 1320  
New York, New York 10007-1312

Re: *Skiplagged, Inc. vs. Southwest Airlines Co.*, Civil No. 1:21-cv-05749-JPC

Dear Judge Cronan:

This firm represents Skiplagged, Inc. ("Skiplagged") in the above-referenced action and we respectfully submit this letter, with assent of counsel to Southwest Airlines Co. ("Southwest"), to move for a slight adjustment to the concurrent briefing schedules for the motions in this case. As the Court may recall, Skiplagged moved for a preliminary injunction under the first-filed rule on August 30, 2021 [Dkt. No. 12] and Southwest moved to dismiss or transfer on September 10, 2021 [Dkt. No. 23]. Both motions address similar issues relating to jurisdiction and venue and are partially briefed, with Skiplagged's opposition to the motion to dismiss or transfer due on September 24<sup>th</sup> and its reply on the preliminary injunction motion due on September 27<sup>th</sup>. Correspondingly, Southwest has a right to reply on its motion to dismiss or transfer due on October 1<sup>st</sup>.

The parties have met and conferred believe that judicial efficiency will be best served by Skiplagged filing one unified memorandum of law addressing both motions [Dkt. Nos. 12 and 23] limited to 30 pages rather than filing two similar briefs, one 25 pages and the other 10 pages, with overlapping arguments. There have been no previous requests for extensions of time for these filings. If allowed, this motion does not affect any other scheduled dates or deadlines.

Accordingly, Skiplagged respectfully moves the Court to allow Skiplagged to file a unified memorandum of law in opposition to the motion to dismiss or transfer [Dkt. No. 23] and in reply on the preliminary injunction [Dkt. No. 12] on September 27<sup>th</sup>, limited to 30 pages and to extend Southwest's time to file its reply on the motion to dismiss or transfer [Dkt. No. 23] to October 4<sup>th</sup>.

Respectfully submitted,

/s/ Irwin B. Schwartz (Bar No. 2120178)

Service on counsel by ECF

Irwin B. Schwartz  
Counsel for Skiplagged, Inc.

